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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CAMERON E. OLIVER, Individually and on
behalf of others similarly situated,

Plaintiff,

vs.

BELL TRANS, a Nevada Corporation, and
BRENT J. BELL,

Defendants.

CASE NO.: 2:16-cv-00305-JAD-PAL

**JOINT NOTICE OF SETTLEMENT
AND STIPULATION AND ORDER TO
STAY ALL PROCEEDINGS**

(SEVENTH REQUEST)

Defendants Bell Trans and Brent J. Bell (collectively, “Bell Trans” or “Defendants”), and Plaintiff Cameron E. Oliver, (“Plaintiff”), through their counsel of record, submit the below stipulation to extend the stay of all proceedings in the above captioned matter. On June 19, 2017, after being notified that the parties had agreed to settle, on a collective and class-wide basis, all disputes and claims related to this litigation and related litigation (Case No. 2:15-cv-01066-MMDPAL, *Willie Thurmond v. Presidential Limousine*), the Court granted the parties’ stipulation to stay this matter until July 27, 2017 in order to allow the parties time to set forth in greater detail the terms of the parties’ settlement, as well as to allow Plaintiff’s counsel time to file a motion seeking the Court’s approval of the settlement terms. ECF No. 45. The Court extended that requested stay pursuant to the parties’ further stipulation and order, such order

1 continuing the stay of this matter until August 28, 2017. ECF No. 47. While the parties have
2 been working diligently to finalize all settlement documents for presentation to the Court, they
3 require additional time and respectfully stipulate as follows:

4 The parties agree to stay all proceedings in the above captioned matter for a period of 30
5 additional days beyond the current stay, ending on August 28, 2017, to allow for the preparation
6 and finalization of appropriate settlement documents. As set forth herein, this is the parties' third
7 request to stay this matter for the purpose of memorializing their negotiations into settlement
8 documents. If this stipulation is granted, the current stay shall be extended until Wednesday,
9 September 27, 2017.
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11 The forgoing request for stay is made in good faith not for the purpose of delay.
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13 **IT IS SO ORDERED.**

14 Dated: August 31, 2017.

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UNITED STATES DISTRICT JUDGE
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5 Dated: August 28, 2017

6 Respectfully submitted,

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8 /s/ Dana Sniegocki

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Attorneys for Plaintiffs

Dated: August 28, 2017

Respectfully submitted,

/s/ Peter Navarro

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Attorneys for Defendants

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15 IT IS SO ORDERED:

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19 United States District Judge
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